



Telecom Management, Inc. d/b/a Pioneer Telephone
583 Warren Avenue • Portland • Maine • 04103
Phone: (207) 774-9500 • Fax: (207) 774-9508
www.pioneertelephone.com

Received & Inspected

FEB 27 2008

FCC Mail Room

February 19, 2008

ENFORCEMENT BUREAU
TELECOMMUNICATIONS CONSUMERS DIVISION
FEDERAL COMMUNICATIONS COMMISSION
445 12TH ST SW
WASHINGTON DC 20554

RE: CPNI Compliance Certificate & Accompanying Statement
Telecom Management, Inc dba Pioneer Telephone
EB Docket No. 06-36

To Whom It May Concern:

I have enclosed copies of Pioneer Certificate and Statement filed with the FCC's Secretary.

Please contact me if you have questions or need additional information.

Sincerely,

Kevin Photiades
Regulatory Manager
regulatory@pioneertelephone.com



COPY

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Via Certified Mail, RRR, No. 70032260000702925076

February 19, 2008

MARLENE H DORTCH
OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
445 12TH ST SW
STE TW-A325
WASHINGTON DC 20554

Re: CPNI Compliance Certificate & Accompanying Statement
Telecom Management, Inc. dba Pioneer Telephone (Pioneer)
EB Docket No. 06-36

Dear Secretary Dortch:

I have enclosed a certificate and accompanying statement to comply with the requirements of 47 CFR §64.2009(e).

Please contact me at the telephone number listed above or via e-mail at regulatory@pioneertelephone.com if you need additional information.

Sincerely,

Kevin Photiades
Regulatory Manager

Encl.: 4 copies
cc: Enforcement Bureau, Telecom Consumers Division, FCC (2 copies) ✓
Best Copy and Printing, Inc. (1 copy)

ANNUAL 47 CFR § 64.2009(e) COMPLIANCE CERTIFICATION

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: February 19, 2008

Name of company covered by this certification: Telecom Management, Inc. d/b/a Pioneer Telephone

Form 499 Filer ID: 824332

Name of signatory: Susan Bouchard

Title of signatory: President and Treasurer

I, Susan Bouchard, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.


The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Susan Bouchard

Subscribed to and sworn before me this 19th day of February, 2008.



Notary Public in and for the State of Maine

KEVIN PHOTIADES
Notary Public, Maine
My Commission Expires October 3, 2009

ANNUAL 47 CFR § 64.2009(e) COMPLIANCE STATEMENT

EB Docket 06-36

Annual 64.2009(e) CPNI Statement for 2008

Name of Company: Telecom Management, Inc. d/b/a Pioneer Telephone

Form 499 Filer ID: 824332

This statement explains how Pioneer's operating procedures ensure compliance with the FCC's rules relating to CPNI.

Pioneer is a reseller of landline, long distance-only services and regards CPNI as information needing the greatest possible protection. Our customers' private data such as phone numbers called, length of phone calls, services purchased, and personal/credit card information is protected from dissemination to the public in a number of ways. Pioneer participates in VISA/Mastercard's compliance certification program that scans our network for vulnerabilities and ensures Pioneer meets their security standards. To keep hackers from accessing our network, Pioneer utilizes a perimeter based SonicWALL TZ 170 Unrestricted Node device with ICSA Firewall 4.1, ICSA IPsec VPN 1.0d, and FIPS 140-2 industry certifications. In addition, real-time gateway anti-virus, anti-spyware, and intrusion prevention software is utilized to protect Pioneer from an array of network-based and sophisticated application layer threats. Only explicit application-dependent communication ports are authorized for usage as part of our transportation layer security.

On the employee side, each employee of Pioneer is trained to understand the importance of keeping CPNI confidential and made to sign a formal confidentiality agreement. The agreement further imports the weight of this duty on the employee and provides Pioneer with a mechanism to legally enforce this operating procedure should it be breached. Finally, access to customer records is restricted only to those individuals whose jobs require such access. Employees are further trained not to disclose CPNI to a customer over the phone unless the customer identifies their unique information and identifies themselves by a unique password. If the customer is requesting information that is too voluminous (e.g., copies of many month's worth of bills), the information is mailed (not faxed) to the customer's address of record.

In compliance with the FCC's rules, Pioneer monitors accounts and notifies its customers via e-mail and U.S.-mailed postcards when the following activity occurs: new online account set-up, password changes, address of record changes. The body of the e-mail / postcard states what activity has occurred and to contact Pioneer at our toll-free number immediately if the customer believes their CPNI was changed without their authorization.

If a breach of CPNI were to occur resulting in an unauthorized disclosure, Pioneer has put a plan in place to provide electronic notification of the breach to the US Secret Service, the FBI and the FCC.



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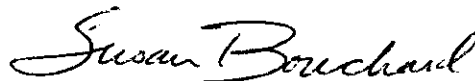
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Susan Bouchard

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KEVIN PHOTIADES
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ANNUAL 47 CFR § 64.2009(e) COMPLIANCE STATEMENT

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